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Douglas Schoenberger
Director
International Government Affairs

December 21, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: In the Matter of Reporting Requirements for U.S. Providers of
International Telecommunications Services, IB Docket No. 04-112

Dear Ms. Dortch:

On December 20, 2005, Jacquelynn Ruff and Leslie Owsley from Verizon, David Nall and Marybeth Banks from Sprint Nextel, and Jim Talbot and I from AT&T met with Emily Willeford from Chairman Martin's office to discuss our joint positions in this docket.

At this meeting, we briefly discussed our joint views regarding the need to streamline the current international reporting requirements, and to insure that no additional requirements are added that are inconsistent with today's highly competitive international market. As documented in the attachment, we discussed the status of some specific items included in the NPRM, and our view that some proposals would only add unnecessary burdens on U.S. carriers. We also discussed the current requirement to provide route-by-route traffic information, and the difficulty of tracking today's highly dynamic international circuit market with the current Section 43.82 reports.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Respectfully submitted,

Douglas Schoenberger

Copy to (w/att.):
E. Willeford

**Reporting Requirements for U.S. Providers of International
Telecommunications Services (IB Docket No. 04-112)
December 20, 2005**

- The Commission should eliminate the reporting requirements in sections 43.61 and 43.82.
 - The highly competitive nature of the U.S. market and increased liberalization of foreign markets eliminates the need for these reports.
 - Furthermore, the dynamic nature of today's international traffic that flows between the U.S. and foreign countries has rendered these reports incapable of providing an accurate picture of this market.
 - Section 43.61 and 43.82 reports now provide insufficient benefits to justify reporting the huge volume of data on an annual (and in some cases, more frequent) basis.
- If the Commission retains these reports they should be significantly streamlined.
 - Such streamlining would continue the effective deregulatory steps taken by the Commission in other areas of its international rules, including modifications to Section 214, the international settlements policy, and submarine cable licensing procedures.
 - A streamlined version that would better balance the benefits and burdens of the reports would be the provision of the following information on a global, annual, aggregate basis:
 - Minutes
 - Revenues
 - Inbound Settlements
 - Outbound Settlements
 - Circuits (64K equivalents)
 - Under no circumstances should international reporting requirements be made more burdensome.
- Several NPRM proposals further the Commission's objective of simplifying international reporting requirements consistent with changes in the international marketplace and should be adopted.
 - Eliminate the current requirement to report number of messages.
 - Eliminate the current requirement to separately report data for off-shore points.
 - Section 43.61 and 43.82 reports should be consolidated into a single report.

- There is near-unanimous agreement among the commenters that proposals for new requirements would be unnecessarily burdensome and require unwarranted changes in reporting systems not commensurate with any regulatory benefit for the competitive international services market. These proposals should not be adopted.
 - Separately reporting retail and wholesale information.
 - Reporting non-route specific revenues.
 - Separate reporting for US carrier country direct/country-beyond services.
 - Separate reporting to divide IMTS traffic between “traditional settlements” and “other” categories.

- The NPRM seeks comment on other potential changes to the reporting requirements.
 - Quarterly traffic and revenue reports for large carriers should be eliminated. (43.61(b))
 - Quarterly reports by switched resale carriers affiliated with dominant carriers should be removed. (43.61(c))
 - Reporting requirements for CMRS providers offering international services via resale should be eliminated. (43.61(a))
 - Carrier-specific circuit status data is competitively sensitive and properly treated as confidential.

- This docket provides an excellent opportunity for the Commission to modify its reporting requirements to reflect the changes in the international services marketplace and continue its deregulatory policies. However, the Commission should carefully weigh the benefits of adopting any proposals that require greater and unprecedented detail against the significant burden in terms of staffing and financial resources required by U.S. carriers to gather and analyze the requested data. In our view, the limited benefits do not justify the significant burdens.